

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

CASA DE MARYLAND, INC., et al

Plaintiffs,

v.

WOLF, et al

Defendant.

Civil No. 20-2118-PX

**CONSENT MOTION FOR EXTENTION OF TIME
TO RESPONSE TO THE COMPLAINT**

Defendants, and with plaintiffs' consent, hereby request that their time to answer or otherwise response to the complaint be extended without date, and that defendants be required to submit a status report on November 23, 2020. The reasons for this request is set forth below.

1. Plaintiffs commenced the instant action pursuant to the Administrative Procedure Act, challenging the promulgation of two final rules issued by the U.S. Department of Homeland Security. (ECF No. 1). Plaintiffs moved for a preliminary injunction, and by Order dated September 11, 2020, plaintiffs' motion was granted in part, and denied, in part. (ECF No. 23, 70).

2. Defendants' time to answer or otherwise respond to the complaint is now October 23, 2020. (ECF No. 77).

3. Defendants require additional time for a number of reasons, including to provide

the defendants time to compile and certify the voluminous administrative records at issue.¹

Moreover, defendants have not yet formulated their intended response to the complaint, and the parties have discussed the possibility of agreeing to file cross-motions for summary judgment. Once the administrative records are provided to plaintiffs, and defendants have had additional time to determine how they would like to proceed, the parties will be in a better position to discuss the best way to move forward.

4. Finally, the undersigned will be engaged in a 7-day trial, scheduled to begin on November 2, 2020, and conclude on November 13, 2020. As such, it is believed that the defendants will be in a position to submit a status report by November 23, 2020.

Defendants thank the Court for its consideration of this request.

Respectfully submitted,

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/s/
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¹ The administrative record for the Removal of 30-Day Processing Provision for Asylum Applicant-Related Form I-765 Employment Authorization Applications” 85 Fed. Reg. 37,502-37,546 (June 22, 2020) has been compiled and certified, and once Bates Stamped, a copy will be provided to plaintiffs. The administrative record for the Asylum Application, Interview, and Employment Authorization for Applicants, 85 Fed. Reg. 38,532-38,628 (June 26, 2020) is expected to be completed by early November.